

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In re:

Legacy IMBDS, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10852 (KBO)

(Jointly Administered)

Synacor, Inc.,

Plaintiff,

v.

IV Media, LLC; Innovation Ventures, LLC; Portal Acquisition Co.; iMedia Brands, Inc.; ValueVision Interactive, Inc.; VVI Fulfillment Center, Inc.; ValueVision Retail Inc.; JWH Acquisition Company; PW Acquisition Company, LLC; EP Properties, LLC; FL Acquisition Company; Norwell Television, LLC; 867 Grand Avenue, LLC; and Unidentified Parties, 1-25,

Defendants.

Adv. Proc. No. 23-50753 (KBO)

**STIPULATION BY AND BETWEEN PLAINTIFF AND  
DEFENDANTS EXTENDING DEFENDANTS' TIME TO  
FILE AN ANSWER OR RESPOND TO COMPLAINT**

Legacy IMBDS, Inc. (f/k/a iMedia Brands, Inc.), Portal Acquisition Company, ValueVision Interactive, Inc., VVI Fulfillment Center, Inc., ValueVision Retail, Inc., JWH Acquisition Company, PW Acquisition Company, LLC, EP Properties, LLC, FL Acquisition Company, Norwell Television, LLC, and 867 Grand Avenue, LLC (collectively, the “Debtor”

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors’ service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

Defendants”) and the above-captioned plaintiff (the “Plaintiff”) hereby agree to extend Debtor Defendants’ time to file an answer or respond to the complaint filed by the Plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”). In support hereof, the Debtor Defendants and Plaintiff state as follows:

The Plaintiff initiated the Adversary Proceeding against, among others, the Debtor Defendants by filing a complaint [Adv. Proc. No. 23-50753] (the “Complaint”) with this Court on November 1, 2023.

In order to allow the parties an opportunity to resolve the Adversary Proceeding on the merits, the Plaintiff and the Debtor Defendants agreed to extend Defendants’ time to file an answer or respond to the Complaint through and including December 21, 2023. Debtor Defendants acknowledge service and service of process in this Adversary Proceeding.

The parties’ entry into this Stipulation shall be without prejudice to the ability of the parties to seek a further extension or modification of the Debtor Defendants’ time to answer or respond to the Complaint.

*[Remainder of Page Intentionally Left Blank]*

Dated: December 6, 2023

**PACHULSKI STANG ZIEHL & JONES  
LLP**

*/s/ Laura Davis Jones*

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**GIBBONS P.C.**

*/s/ Christopher Viceconte*

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